

June 14, 2013

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-B204  
Washington, DC 20554

Re: WC Docket No. 10-90; WT Docket No. 10-208

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we hereby provide you with notice of an oral ex parte presentation in connection with the above-captioned proceedings. On June 12, 2013, Ben Moncrief and undersigned counsel, on behalf of C Spire Wireless ("C Spire") met with Priscilla Argeris in Commissioner Rosenworcel's office, Nicholas Degani in Commissioner Pai's office, and Rebekah Goodheart in Commissioner Clyburn's office.

In our meetings, we discussed the upcoming Phase II Mobility Fund auction. C Spire advocated targeting Phase II funding to those areas that lack 4G service. C Spire believes that coverage should be demonstrated by road miles, as the testing parameters are known to carriers and developing new ones for testing service at residences or businesses will prove to be unduly complicated, difficult to comply with, and to enforce.

C Spire favors removing the letter of credit and opinion letter requirements in Phase II, as the FCC has ample tools at its disposal to enforce its performance requirements. In addition, the existing rule that makes an area ineligible if a carrier makes a public commitment to provide service by a date certain is extraordinarily difficult to enforce and should be eliminated.

If you have any questions or require any additional information, please contact undersigned counsel directly.

Sincerely,



David A. LaFuria  
Counsel for C Spire Wireless

cc: Rebekah Goodheart  
Priscilla Argeris  
Nicholas Degani